

EXHIBIT A

Daniella Esther Rodriguez - 6/5/2025

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
CIVIL ACTION NO.: 4:4-CV-10017 MARTINEZ SANCHEZ

AKARI JOHNSON, ET. AL.,

Plaintiff,

vs.

MMI 82, LLC, ET. AL.,

Defendant.

ZOOM DEPOSITION

Thursday, June 5, 2025

10:00 a.m. - 2:31 p.m.

DEPOSITION OF DANIELLA ESTHER RODRIGUEZ

Taken before JANSEN VIANA, Court Reporter, a
Notary Public for the State of Florida at Large,
pursuant to Notice of Taking Deposition filed in the
above-styled cause.

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1 Morada. I was responsible for interacting with the DOL
2 investigator, but Oneil made sure he approved all of my
3 e-mail communications before I sent them. During this
4 investigation, Oneil instructed me to make key files
5 including paychecks, pay stubs and other financial
6 records "disappear" as if "there was a hurricane that
7 destroyed them."

8 Oneil explicitly asked me to destroy key financial
9 records, even though I was not comfortable doing so. I
10 had no choice but to follow Oneil's orders and destroy
11 some of these key documents. What was the Department of
12 Labor investigating?

13 A We didn't have a workman's comp, and Keith
14 Morecraft started a lawsuit.

15 MR. NARULA: Let me take a quick break,
16 please, to the bathroom.

17 THE COURT REPORTER: -- 01:24.

18 (Thereupon, a short discussion was held off
19 record.)

20 (Deposition resumed.)

21 THE COURT REPORTER: We are back on the record
22 at 01:33.

23 Q (By Mr. Narula) Before we took a break, you
24 explained the Department of Labor was investigating
25 because the hotel had no workers comp, and that Keith

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1 Morecraft started a lawsuit. Is that right?

2 A Yes.

3 Q Did you destroy the documents?

4 A There were no documents really. There was
5 like, no insurance, no, anything valid.

6 Q Okay. So, you didn't destroy anything?

7 A No, I couldn't find. There was nothing.

8 MR. BARROUKH: Objection to form.

9 Q (By Mr. Narula) Paragraph 19 of the
10 declaration states, Casa Morada is a toxic, hostile
11 working environment that caused me severe emotional
12 distress. The hotel hired you even though you didn't
13 have prior experience in the hotel industry, right?

14 A Correct.

15 Q Not only were you given a job, then you
16 became the General Manager, right?

17 A That's what I was basically hired to do.

18 Q Mr. Khosa then gave you money to buy work
19 clothes after you were hired, right?

20 A Correct.

21 Q He didn't have to do that. Was that a, no?

22 A No.

23 Q Okay. The hotel allowed you to sleep at the
24 hotel free of charge because you live far away, right?

25 A Correct.

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1 instructed me to make key files, including paychecks,
2 pay stubs and other financial records disappear as if
3 there was a hurricane that destroyed them. Is that a
4 true statement?

5 MR. NARULA: Objection, asked and answered.

6 MR. BARROUKH: You can answer.

7 Q (BY Mr. Barroukh) Did Oneil ask you to
8 destroy key documents, as if there was a hurricane that
9 destroyed them?

10 MR. NARULA: Same objection.

11 A I don't recall.

12 Q (BY Mr. Barroukh) Now you said that Oneil
13 previously, in an instant or circumstance regarding my
14 Rolex that went missing, he threw out timecards. Is
15 that correct?

16 A Yes, not him physically. He was standing
17 present in the room when I had two other housekeepers
18 in there with me, and he was instructing us to just
19 throw everything away. Everything that was in my room
20 since I was leaving, he just said, throw everything
21 away. And that was Adriana who was in the room. She can
22 testify to that. And there were one or two more
23 housekeepers that were in there.

24 Q Do you know if Mr. Khosa identified the time
25 courts before he asked you to throw those away?

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1 MR. NARULA: Objection, speculation.

2 A I don't believe so. I mean, it was all in
3 plain sight, what we were throwing, he was standing
4 there, but I did it verbally, or nobody verbally said,
5 look, these are timecards. It was just out in the open
6 and just put in the box.

7 Q (BY Mr. Barroukh) And is every statement made
8 in this declaration truthful?

9 A Yes.

10 Q Now Ms. Frapp at her deposition testified
11 that she found documents in a certain file cabinet
12 destroyed as if a storm had done. Do you understand?

13 A Um-hum.

14 Q Do you know, or do you have any reason to
15 believe that why those documents were destroyed, or do
16 you have knowledge as to why those documents were
17 destroyed?

18 MR. NARULA: Objection, speculation.

19 A I am not sure why they would have been
20 destroyed.

21 Q (BY Mr. Barroukh) Do you know how those
22 documents came to become damaged by water?

23 MR. NARULA: Objection, asked and answered.

24 A I'm not sure because we haven't had any
25 hurricanes in the Keys in a while.

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1 Q (BY Mr. Barroukh) And when it comes to
2 collecting timesheets and timecards, whose
3 responsibility was it as to those two sets of
4 documents?

5 A So, the actual timecards, normally, if
6 Adriana was working at the front desk, she would open,
7 and it was time for the payroll cut. She would grab
8 them from the room and leave them for me at the front
9 or, if it was me, I would just go when I would leave
10 the room, grab them and go do payroll.

11 It was either only basically just me, and every
12 now and then, Adriana and she would just grab the whole
13 chunk and leave them for me so I can start processing
14 payroll.

15 Q And did you ever throw out any timecards at
16 any point during --

17 A I never did.

18 Q Okay. And did Aileen ever tell you to discard
19 timecards?

20 A She never told me to discard. She told me
21 that she was told to discard certain documents while
22 she was there.

23 MR. NARULA: Objection, hearsay.

24 Q (BY Mr. Barroukh) Did Aileen ever tell you
25 Oneil instructed her to destroy financial records?

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1 MR. NARULA: Objection, hearsay.

2 A She didn't, the whole thing is he or she say,
3 this whole thing. What I am telling you is he, she says
4 what Daniel can say, everything. So, she did tell me
5 that.

6 Q (By Mr. Barroukh) And can you continue with
7 what she told you about?

8 A She just expressed to me, because when the
9 Department of Labor showed up, I was stressed out. And
10 I called her telling her, hey, this is what's going on.
11 I am not sure how to handle this whatnot. And then she
12 just told me, look, try to find whatever you can when
13 it comes to the timesheets, the timecard, whatever
14 documents that you have, and just have and just have it
15 ready.

16 And then she - that's when she told me, look a
17 while back something similar -- something happened, and
18 I was instructed to just get rid of the documents. And
19 then it was a hurricane that came by, or a storm or
20 something like that, something of that nature.

21 Q And to confirm Aileen told me that Oneil
22 asked her to destroy these documents as if a storm or
23 hurricane had hit --

24 A Yes.

25 Q -- is that correct?

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1 MR. NARULA: Objection, hearsay.

2 A Yes.

3 Q (BY Mr. Barroukh) Now, whether you intended
4 to destroy documents related to the Department of
5 Labor's FLSA investigation, whether you intended to
6 destroy those or not. Did you destroy any documents
7 that would have been part of that FLSA investigation?

8 MR. NARULA: Objection, asked and answered.

9 A I did not destroy anything.

10 Q (BY Mr. Barroukh) Okay. Did Oneil ever ask
11 you to destroy documents?

12 A I don't recall.

13 Q And again, you have no recollection as to how
14 Hazel and Akari performed their roles while they were
15 employed at the company. Is that correct?

16 A Honestly, I don't. I heard that Hazel was
17 really good at what she did, with the events. I heard
18 Akari was really good at the front desk, which is what
19 shocked me when I found certain things. But besides
20 that, me personally, like I said, I never worked with
21 them, so I can't say for me.

22 Q Do you know that Oneil on several occasions,
23 via text messages made advances to Hazel, asking her to
24 come over to his house?

25 MR. NARULA: Objection.

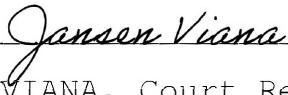
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1 CERTIFICATE OF OATH
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6 I, JANSEN VIANA, Court Reporter, Notary Public, State
7 of Florida, certify that DANIELLA ESTHER RODRIGUEZ
8 personally appeared before me on the 5th day of June 2025,
9 and was duly sworn.

10 Signed this 20th day of June 2025.
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14 JANSEN VIANA, Court Reporter
15 Notary Public, State of Florida
16 Commission No. HH678164
17 Commission Expires: 05/21/2029
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CERTIFICATE OF REPORTER

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I, JANSEN VIANA, Court Reporter, certify that I was authorized to and did report the Deposition of DANIELLA ESTHER RODRIGUEZ; that a review of the transcript was requested; and that the transcript is a true and correct record of my notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties, attorneys or counsel connected with the action, nor am I financially interested in the action.

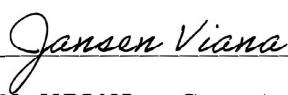
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Dated this 20th day of June 2025.

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JANSEN VIANA,

Court Reporter

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